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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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BRIAN RAJZER,

Plaintiff,

Case No. CV-

-vs-

Hon. Richard Alan Enslen
U.S. District Judge

API OUTDOORS, INC., a Louisiana corporation,
API OUTDOORS, A DIVISION OF OUTLAND
SPORTS, a foreign corporation, OUTLAND
SPORTS, INC., a foreign corporation, and
PAUL MEEKS, an individual, jointly and severally,

State Court No.:
01-49084 NO B

Judge: Hon. William Buhl
Circuit Court Judge

Defendants, Jointly and Severally.

PAUL A. ROSEN, P19630
Attorney for Plaintiff
25505 West Twelve Mile Road, #1000
Southfield, Michigan 48034
(248) 213-2910

Secrest, Wardle, Lynch, Hampton, Truex,
and Morley, P.C.
By: ROBERT B. HOLT, JR., P 31417
Attorney for Defendants
30903 Northwestern Highway
P.O. Box 3040
Farmington Hills, MI 48333-3040
(248) 851-9500

NOTICE OF REMOVAL

Defendants, API OUTDOORS, INC., a Louisiana corporation, API
OUTDOORS, A DIVISION OF OUTLAND SPORTS, OUTLAND SPORTS, INC., a
Missouri corporation, and PAUL MEEKS, an individual, through their attorneys,
SECREST, WARDLE, LYNCH, HAMPTON, TRUEX, AND MORLEY, P.C., petitions this

SECREST, WARDLE, LYNCH, HAMPTON, TRUEX AND MORLEY

Court, pursuant to 28 USCS §1441 and §1446 for removal of the above entitled cause to the United States District Court for the Western District of Michigan, Southern Division, for the following reasons:

1. On or about November 30, 2001, Plaintiff Brian Rajzer filed a lawsuit against Defendants API OUTDOORS, INC., API OUTDOORS, a division of OUTLAND SPORTS, OUTLAND SPORTS, INC. and PAUL MEEKS in the 36th Judicial Circuit Court (Van Buren County), which was assigned case number: 01-49-084-NO-B.
2. Summonses were issued against the Defendants on or about November 30, 2001. A copy of the summons and complaint served upon Defendant Paul Meeks is attached. Paul Meeks received the complaint on January 15, 2002.
3. This case involves a controversy between citizens and corporations of different states and this Court has original jurisdiction of this civil action pursuant to 28 USC §1332. Plaintiff, Brian Rajzer is a resident of the State of Michigan. Paul Meeks is a resident of the State of Louisiana. API Outdoors, Inc., was a Louisiana corporation, with its principal place of business in Louisiana. Outland Sports, Inc. is a Missouri corporation, with its principal place of business in Kansas. The API Outdoors division of Outland Sports is not a separate legal entity, but its principal place of business is in Louisiana.
4. The amount in controversy allegedly exceeds the sum of Seventy Five Thousand (\$75,000.00) Dollars, exclusive of interest and costs and is otherwise within the original jurisdiction of the United States District Court pursuant to 28 USC § 1332.
5. The time for the filing of this Notice of Removal has not expired, and the filing has been made timely pursuant to Title 28, USCS §1446.

6. Written notice of the filing of this Removal is being given promptly to all parties, and filed in State Court, in accord with Title 28, USCS §1446(d).

7. Attached to this petition and incorporated by reference is a copy of the summons and complaint served on Defendant, Paul Meeks.

For these reasons, Defendants and petitioners respectfully request that this case be removed from the Circuit Court for the 36th Judicial Circuit of Michigan to the United States District Court for the Western District of Michigan, Southern Division.

Respectfully submitted,

SECREST, WARDLE, LYNCH, HAMPTON
TRUEX AND MORLEY

BY: Robert B. Holt, Jr.

Robert B. Holt, Jr., P31417
Attorney for Defendants
30903 Northwestern Highway
P.O. Box 3040
Farmington Hills, MI 48333-3040
(248) 851-9500

Dated: February 14, 2002

PROOF OF SERVICE	
The undersigned certifies that a copy of the foregoing instrument was served upon all parties to the above cause to each of the attorneys of record herein at their respective addresses as directed on the pleadings on February 14, 2002.	
By:	<input checked="" type="checkbox"/> U.S. Mail and/or <input type="checkbox"/> Fax
	<input type="checkbox"/> Hand Delivery <input type="checkbox"/> UPS
	<input type="checkbox"/> Federal Express <input type="checkbox"/> Other
Signature:	<u>Deborah P. Mefford</u>

SECREST, WARDLE, LYNCH, HAMPTON, TRUEX AND MORLEY